Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of	)	
	)	
Administration of the North American	)	**CC Docket 92-327**
Numbering Plan	)	
	)	
	)	
Numbering Resource Optimization	)	**CC Docket 99-200**
	)	

Comments of Hewlett Packard

Hewlett Packard (HP) is a major provider of IT solutions in the world. HP has unrivaled expertise in all aspects of providing customers effective use and management of data and IT resources including IT operations strategy, transformation services, data warehousing and business intelligence across industries. HP has substantial expertise in providing these solutions to the telecommunications, government, financial service and manufacturing sectors.   HP has a proven ability to collaboratively manage projects to achieve the best solutionHP has successfully managed IT operations and data management projects in the regulatory telecommunications arena with independence, objectivity and efficiency. In addition, HP has substantial experience in complying with the requirements of a Federal Acquisition Regulation (FAR) based contract.   HP can effectively and efficiently administer the North American Numbering Plan (NANP) and looks forward to the opportunity to bid on the project.

The NANPA Technical Requirements Document is thorough, comprehensive and will provide a firm basis for soliciting bids for the next term of the NANP Administrator. HP believes, however, that there is some additional information that could improve the

Technical Requirements Document and result in the best proposals and evaluation process.

I. Including Some Broad Performance Measures Focused on Customer Service in the Statement of Work will Improve the Selection Process.

Explicitly stated performance measures will allow potential bidders to more accurately understand the performance expectations of the industry, the FCC and other involved parties and, therefore, realistically analyze the costs of being the NANPA. There is an important customer service aspect to the administration of the NANP, which should be integrated into any solicitation for the next term of the Administrator. The industry depends on the activities of the NANPA to implement its business plans, and the NANPA should be able to act on applications quickly and accurately in order to keep up with the business needs of the fast paced telecommunications marketplace. Speed and accuracy are also crucial to the efficient management of limited number resources. Establishing the criteria that will be used to measure success will improve both customer service and efficiency.

Improved understanding by potential bidders of performance expectations and the costs required to meet those expectations will lead to more realistic bids which truly reflect the cost of providing the level of service quality expected for the NANPA. Realistic bids will help to avoid the need for upward adjustments during the contract term. In addition, performance measures will aid the FCC and other stakeholders in the selection of a vendor by providing a tool with which to better evaluate the competing bids. A project of this size is best evaluated by looking at both price and performance.

Specifically, the FCC should consider including measures in the RFP in the following areas: a time frame for the assignments of NPA and Central Office codes after a complete request is received; increased use of web-based applications in order to reduce the need for slow and expensive data-entry; continued reduction in code conflicts; efficiency in reclamation of unused-but-assigned number resources, and accuracy of the Carrier Identification Code (CIC) data. Performance in these areas has a critical impact

on customer service quality, efficient management of number resources and the costs of administering the NANP.

II. **Additional Information Regarding the Transition to a New Vendor Would also Improve the Bidding Process**.

A complete listing of the transition related obligations of the current administrator should be available to potential bidders. In addition, an inventory of the databases, software, hardware and related equipment, and documentation that would transfer to a new administrator, as well as their locations, is important to the development of precise and realistic responses to a Request for Proposals. The transition to a different Administrator presents many challenges for which potential vendors need to carefully plan. Full information regarding the current administration of the NANP is crucial to make a transition successful. While the proposed Technical Requirements state that the Administrator should be prepared at the end of its term to participate in the transfer to a new administrator, if required, it does not clearly state the obligations of the current administrator in a transition. It is not clear from the Technical Requirements Document if the transition requirements of the current Administrator are the same as those which would be applied to the Administrator for the next term under these requirements. For example, clear indication of whether all the systems that currently support the administration of the NANP would transfer to a new administrator, or simply the data itself, are critical to bidders' ability to craft accurate bids.

Conclusion

The Technical Requirements Document is a firm foundation for a request for proposals to administer the NANP. It could be improved with inclusion of performance measures and more detailed information on the transition from the current Administrator.

Respectfully Submitted,

Ellen Blackler
Regulatory Consulting Practice
Hewlett Packard Company
301-670-4440
Ellen_Blackler@hp.com

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